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Attorney at Law
5519 Rockingham Road-East
Greensboro, NC 27407
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February 20, 1995

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FEB 27 1995

FOOTNOTES

VIA FEDERAL EXPRESS

DOCKET FILE COPY ORIGINAL

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RE: Petition for Rule Making

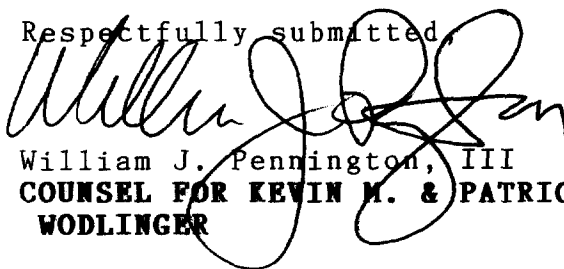
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Dear Mr. Caton:

Transmitted herewith, on behalf of Kevin M. & Patricia W. Wodlinger, is an original and four (4) copies of a "Petition for Rule Making and Request for Modification of Station License".

Should there be any questions regarding this matter please do not hesitate to contact the undersigned.

Respectfully submitted,



William J. Pennington, III
COUNSEL FOR KEVIN M. & PATRICIA W.
WODLINGER

Enc.
WJP/tlt

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FEB 27 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Amendment of Section 73.202(b)) MM Docket No.
Table of Allotments) RM-
FM Broadcast Stations)
(Cassville and Kimberling)
City, Missouri)

Directed to: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

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**PETITION FOR RULE MAKING AND
REQUEST FOR MODIFICATION OF STATION LICENSE**

Kevin M. & Patricia W. Wodlinger (hereinafter "Wodlinger"), licensee of FM Station KRLK at Cassville, Missouri, hereby petitions the Commission to institute a rule making proceeding seeking the reassignment of Channel 261 from Cassville, Missouri to Kimberling City, Missouri and upgrading the channel classification from Class A to Class C2, by changing the Table of Allotments as follows:

COMMUNITY	ALLOTMENTS	
	EXISTING	PROPOSED
Cassville, MO	261A	None
Kimberling City MO	None	261C2

In addition, it is requested that the Commission modify the license of FM Station KRLK to specify operation on Channel 261C2 at Kimberling City, Missouri. The instant petition meets all

the Commission's criteria outlined for a change in community of license. This proposed change in allotment will not deprive Cassville of its only local transmission service. The new allotment at Kimberling City will result in a net service benefit for the affected communities. See, Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094, 7097 68 RR 644, 650 (1990). In support whereof, the following is shown:

1. Attached as Exhibit E-1 is an FM channel spacing study which demonstrates that the proposed new allotment at Kimberling City is mutually exclusive with the existing allotment at Cassville. This study shows that but for the use of Channel 261A at Cassville, the proposed reassignment of Channel 261 could be made to Kimberling City, and the Commission's minimum channel spacing requirements could be met for that channel's allocation to the community as a Class C2 facility.

2. At present, there are no other FM stations assigned or licensed to Cassville nor are there any existing AM stations licensed to the community. Being filed concurrently with this petition for rule making is a Form 301 application seeking a change in the community of license for AM Station KRMO at Monett, Missouri to Cassville. KRMO(AM) operates daytime only on 990 kilohertz with 2.5 kilowatts of power. This proposed change in community of license can be effectuated without any technical changes being made to KRMO(AM). The station presently places the

required 5.0 mV/m service contour completely over the community of Cassville from its presently authorized antenna site near the city of Monett. A copy of the KRMO(AM) application is attached hereto as Exhibit E-2. The proposed change in community of license for KRMO(AM) will not leave Monett without local broadcast service. FM Station KKBL will continue to be licensed to, and serve, the community of Monett. Station KKBL operates on 95.9 megahertz with 6.0 kilowatts of power and an antenna height of 270 feet above the average terrain. The petitioner in this matter is the licensee of all stations mentioned above, KRLK(FM), KRMO(AM) and KKBL(FM).

2. Kimberling City has no AM Stations nor FM channel allotments. Kimberling City receives 1.0 mV/m service from 8 FM Stations.

3. The application of the Commission's FM allotment priorities and policies to the communities of Cassville and Kimberling City demonstrates that the proposal will result in a preferential arrangement of allotments. See, Revision of FM Assignments, Policies and Procedures, 90 FCC 2d 88, 92 (1982). The proposed allocation of Channel 261C2 to Kimberling City would not provide (1) first aural service, or (2) second aural service; but would provide (3) first local service to Kimberling City, In addition, the Petitioner submits that evaluation of (4), other public interest matters, also results in a preferential arrangement of allotments. Revision of FM Assignments, supra.

4. Kimberling City, the county seat of Stone County,

Missouri had a 1990 population of 1590 persons. Kimberling City is not located in or near any urbanized areas as determined by the United States Census Bureau. Stone County had a 1990 population of 19,078 persons. Monett has a 1990 population of 6,527 persons. Barry County, where Monett is located, has a 1990 population of 27,547 persons. At present, Stone County has no local broadcast service.

5. All FM channel spacing requirements can be met for the allotment of Channel 261C2 to Kimberling City. Exhibit E-3 depicts the areas where a tower location can be found for the use of Channel 261C2 at Kimberling City. This area to locate is large enough to find a suitable tower site where the complete city of license could receive 70 dBu service.

6. Channel 261, if reassigned to Kimberling City, and upgraded in classification to Class C2, will serve three times as many persons within the station's proposed 60 dBu service contour than the station presently does as a Class A facility. Attached as Exhibit E-4 is a study which contrasts the number of persons and area within the station's present 60 dBu service contour with that which would be experience if reassigned to Kimberling City and allowed to upgrade to Class C2 classification. This significant difference in persons and area is relevant when evaluating public interest concerns involving a petition such as the one presented here.

7. Because Channel 261C2 would not be available to a third party for use at Kimberling City, the Petitioner's license may be

modified to specify operation on the higher class channel pursuant to Section 1.420(g) of the Commission's Rules.

8. Should the Commission reassign Channel 261 to Kimberling City and allow for the upgrade of the channel's classification to Class C2 status, the Petitioner will immediately tender for filing with the Commission an application seeking operation with the upgraded facilities from the new community of license. If granted a construction permit covering these facilities changes, the licensee will immediately construct the changes to the station.

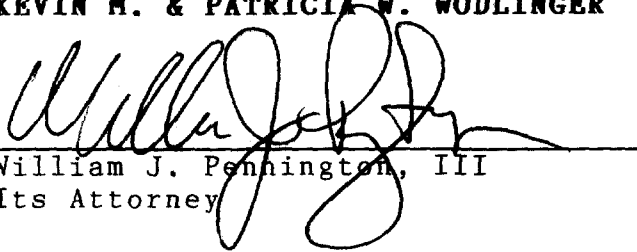
9. In summary, the reassignment of Channel 261 from Cassville to Kimberling City, and the requested upgrading of the allotment to Class C2 classification, would allow the station to serve a significantly greater number of persons while allowing Kimberling City to obtain a first local broadcast service. The reassignment of Channel 261 from Cassville to Kimberling City would not leave Cassville void of any local service. As set forth herein, the Petitioner, also the licensee of AM station KRMO at Monett, Missouri, has concurrently filed an application with the Commission requesting that KRMO(AM) be allowed to change communities of license to Cassville. It is clear that the reassignment of Channel 261 from Cassville to Kimberling City meets all of the criteria set forth in Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094, 7097 68 RR 2d 644, 650 (1990) and is in the public interest

and thus should be granted.

WHEREFORE, Kevin M. & Patricia W. Wodlinger, respectfully requests that the Commission, (i) reassign Channel 261 from Cassville, Missouri to Kimberling City, Missouri; (ii) upgrade Channel 261 to Class C2 classification, and; (iii) modify the existing KRLK(FM) license to outline operation on Channel 262C2 at Kimberling City, Missouri with Class C2 facilities.

Respectfully submitted,

KEVIN M. & PATRICIA W. WODLINGER



William J. Pennington, III
Its Attorney

5519 Rockingham Road-East
Greensboro, NC 27407

(910) 299-5257

February 20, 1995

EXHIBIT E-1

FM CHANNEL SPACING STUDY

Kimberling City, Missouri

Reference Point
 36-30-00 North
 93-23-00 West

Search Date
 02-10-95

CLASS C2

-----CHANNEL 261 - 100.1 MHz-----							
CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
KRLK	261A	Cassville	MO	290.5	40.38	166.0	-125.62
KWMQ	262A	Southwest City	MO	270.5	109.87	106.0	3.87
KREB	258A	Huntsville	AR	226.3	59.93	55.0	4.93
KUKUFM	262C2	Willow Springs	MO	62.7	136.24	130.0	6.24
KGMVFM	263C2	Aurora	MO	349.7	67.02	58.0	9.02
KTCSFM	260C	Fort Smith	AR	216.5	197.10	188.0	9.10
KADI	258A	Republic	MO	359.2	73.80	55.0	18.80
APP	260C3	Buffalo	MO	4.4	140.37	117.0	23.37
KHST	260A	Lamar	MO	322.4	129.44	106.0	23.44
KMAC	259C2	Gainesville	MO	82.8	82.20	58.0	24.20
KBFL	260A	Buffalo	MO	15.3	130.95	106.0	24.95
ALC	259A	Neosho	MO	289.2	95.15	55.0	40.15
KWCKFM	260C2	Searcy	AR	132.1	174.39	130.0	44.39
KDDK	262C1	Jacksonville	AR	156.8	205.27	158.0	47.27
KJMO	261C2	Jefferson City	MO	21.0	240.61	190.0	50.61
KYFM	261A	Bartlesville	OK	276.7	222.64	166.0	56.64
KBHG.C	207C2	Fayetteville	AR	218.9	92.14	20.0	72.14

EXHIBIT E-2

**COPY OF KRMO(AM) APPLICATION
REQUESTING CHANGE IN COMMUNITY OF LICENSE**

Approved by OMB
3060-0027
Expires 6/30/95

FCC 301

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

COPY

FOR
FCC
USE
ONLY

RECEIVED

FEB 27 1995

FCC MAIL ROOM

APPLICATION FOR CONSTRUCTION PERMIT
FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY

FILE NO.

Section 1 - GENERAL INFORMATION

1. APPLICANT NAME

MONETT COMMUNICATIONS, INC.

MAILING ADDRESS (Line 1) (Maximum 35 characters)

1569 NORTH CENTRAL

MAILING ADDRESS (Line 2) (if required) (Maximum 35 characters)

CITY

MONETT

STATE OR COUNTRY (if foreign address)

MO

ZIP CODE

65708

TELEPHONE NUMBER (include area code)

(417) 235-6041

CALL LETTERS

KRMO(AM)

OTHER FCC IDENTIFIER (IF APPLICABLE)

FOR MAILING THIS APPLICATION, SEE INSTRUCTIONS FOR SECTION 1 - GENERAL INFORMATION B.

2. A. Is a fee submitted with this application?

☒ Yes ☐ No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1112) and go to Question 3.

☐ Governmental Entity

☐ Noncommercial educational licensee

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter in Column (C) the result obtained from multiplying the value of the Fee Type Code in Column (A) by the number listed in Column (B).

(A)	(B)	(C)	
FEE TYPE CODE	FEE MULTIPLE (if required)	FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY
(1) M U R	0 0 0 1	\$ 2,590.00	

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

(A)	(B)	(C)	
			FOR FCC USE ONLY
(2)	0 0 0 1	\$	

ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (2), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.

TOTAL AMOUNT REMITTED
WITH THIS APPLICATION

\$ 2,590.00

FOR FCC USE ONLY

3. This application is for: (check one box)

☒ AM

☐ FM

☐ TV

(b) Channel No. or Frequency

990 kHz.

(b) Principal
Community

City

MONETT

State

MO

FCC 301

August 1992

Section I - GENERAL INFORMATION (Page 2)

(c) Check one of the following boxes:

- ☐ Application for NEW station
- ☒ MAJOR change in licensed facilities; call sign: KRMO
- ☐ MINOR change in licensed facilities; call sign:
- ☐ MAJOR modification of construction permit; call sign:
- File No. of construction permit:
- ☐ MINOR modification of construction permit; call sign:
- File No. of construction permit:
- ☐ AMENDMENT to pending application; Application file number:

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

4. Is this application mutually exclusive with a renewal application? ☐ Yes ☒ No

If Yes, state:

Call letters	Community of License	
	City	State

TECHNICAL REPORT AND EXHIBITS
MONETT COMMUNICATIONS, INC.
SEEKING A CONSTRUCTION PERMIT FOR
STATION KRMO(AM)
MONETT, MISSOURI

PREPARED FEBRUARY 1995

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ACCEPTANCE OF TERMS

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William J. Pennington, III
5519 Rockingham Road-East
Greensboro, NC 27407
(910) 299-5257

ENGINEERING EXHIBITS

Certification

Engineering Statement

Form 301 Section V-A

Existing KRMO(FM) 5.0 mV/m Contour
Showing Complete Coverage of Cassville.....E-1

M-3 Map of Ground Conductivity Showing
Conductivity Between KRMO(FM) Antenna
Site and City of Cassville.....E-2

CERTIFICATION

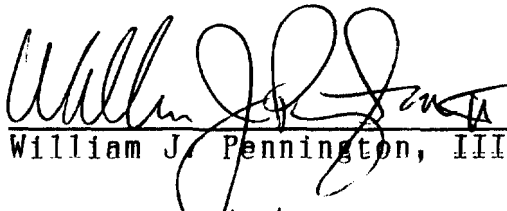
I, William J. Pennington, III, do hereby certify:

That my qualifications in telecommunications matters are of record before the Federal Communications Commission having been presented and accepted on many occasions in the past; and

That I am a consultant on technical topics pertaining to the broadcast industry and the associated RF transmission systems; and

That I have been retained by Monett Communications, Inc. to perform certain technical studies and prepare this report of same; and

That the accompanying technical report and exhibits were prepared by me personally or under my immediate supervision and that all information presented therein is true and correct to my knowledge and belief.



William J. Pennington, III
(Date) 2/13/95

E N G I N E E R I N G S T A T E M E N T

This engineering statement and associated exhibits have been prepared on behalf of Monett Communications, Inc., licensee of AM Station KRM0 at Monett, Missouri. This application seeks only to change the station's community of license to Cassville, Missouri.

KRM0(AM) presently operates with 2.50 kilowatts utilizing a non-directional radiator. This application proposes no changes in the present technical facilities of KRM0(AM).

Since this application does not request any changes in the station's present technical facilities, much of the information requested in the attached Section V-A of the Commission's Form 301 can be found on KRM0(AM)'s application for construction permit seeking an increase in power from 250 watts daytime to 2.50 kilowatts daytime. The Commission file number for this application is BP-870107AC. This application was granted in October 1987.

Exhibit E-1 is a copy of a portion of the Kansas City Sectional Aeronautical Chart showing both the present KRM0(AM) antenna site and the corporate limits of the town of Cassville. This map also shows the predicted 5.0 mV/m service contour for the present KRM0(AM) operation. From this antenna site, just north of downtown Monett, KRM0(AM) places a 5.0 mV/m service contour completely over the town of Cassville, as required by Section 73.315(a) of the Commission's Rules. Exhibit E-2 is a copy of the Commission's M-3 Map of Conductivity showing both the

location of the present KRMO(AM) antenna site and the town of Cassville. This map shows that the ground conductivity between the two locations is 8 mmhos.

Cassville is a county seat of Barry County, Missouri and had a 1990 population of 2371 persons. The applicant is also the licensee of FM Station KRLK at Cassville. A petition for rule making is being concurrently filed with this application seeking the reassignment of Channel 261 to Kimberling City, Missouri. This petition seeks to increase the classification of Channel 261 when reassigned to Kimberling City. Channel 261 meets all of the Commission's FM channel spacing requirements for Class C2 when assigned to Kimberling City. The assignment of Channel 261C2 to Kimberling City would provide that growing community, and Stone County, where it is located, with a first local broadcast service.

If KRMO(AM)'s community of license is changed to Cassville, Monett will not be left without local broadcast service. FM Station KBKL, also owned by the applicant, will remain licensed to Monett.

No physical construction will be necessary to implement the changes requested in this application, thus this instant proposal should be excluded from environmental processing. Moreover, since no changes are proposed in the KRMO(AM) technical facilities, the station's present compliance with the criteria set forth in OST Bulletin Number 65 will continue if this application is granted. The following observations are made:

1. The present site is located in an area where the public does NOT congregate. Most of the maintenance performed on the KRMO(AM) transmitter is completed when the station is off the air.

2. The tower base is enclosed within an individual protective fence 5 meters distant from the base of the tower. This assures compliance with the requirements set forth in Table 1, Appendix D of the OST Bulletin. The distance computed includes the radiation which is created as a result of the KKBL(FM) antenna being side mounted near the top of the tower.

3. If maintenance is needed to be performed on the tower, both KRMO(AM) and KKBL(FM) will reduce power accordingly, or cease operation altogether, to negate the possibility of workers receiving any harmful amount of RF radiation.

4. The KRMO(AM) transmitter is secure so to only provide access to authorized station personnel. Signage is posted near the transmitter and the fence surrounding the tower warning the public of dangerous RF radiation.

Based on the foregoing, it is clear that the present operation, which will not change upon the grant of this proposal, meets all guidelines associated with RF exposure to humans.

Based on the studies included herein, and the accompanying technical exhibits, we trust that this proposal complies with the current applicable requirements of the Commission's Rules and policies. If additional information is needed in connection with this matter, please do not hesitate to contact this office.

Section V-A - AM BROADCAST ENGINEERING DATA

FOR COMMISSION USE ONLY

File No. _____
 ASB Referral Date _____
 Referred by _____

Name of Applicant **MONETT COMMUNICATIONS, INC.**

1. Purpose of Application: (check all appropriate boxes)

- ☐ Construct new station
- ☒ Make changes in authorized/existing station
- ☒ Principal authorized/licensed community
- ☐ Frequency
- ☐ Power
- ☐ Main studio location
- ☐ Antenna system (including increase in height by addition of FM or TV antenna)
- ☐ New antenna construction
- ☐ Alteration of existing structure
- ☐ Increase height
- ☐ Non-DA to DA
- ☐ Decrease height
- ☐ DA to Non-DA
- ☐ Other (Summarize briefly the nature of the changes proposed)
- Call Sign **KRMO**
- ☐ Hours of operation
- ☐ Transmitter location
- ☐ Filed in compliance with an Allotment Plan to migrate to the expanded band
- Allotment Number _____

2. Principal community to be served:

State MO	County BARRY	City or Town CASSVILLE
-------------	-----------------	---------------------------

3. Facilities requested:

Frequency: 990 kHz

Power: Night: - kW Day: 2.50 kW Critical hours: - kW

Hours of Operations: _____

Class of Station (A,B,C or D) D

☐ Stereo ☒ Monaural

4. Transmitter location: ON FILE NO CHANGE

State MO	County BARRY	City or Town MONETT
-------------	-----------------	------------------------

Exact antenna location (street address). If outside city limits, give name of nearest town and distance (in kilometers), and direction of antenna from town. **ON FILE NO CHANGE**

Geographical coordinates (to nearest second). For directional antenna give coordinates of center of array. For single vertical radiator give tower location. Specify South Latitude or East Longitude where applicable; otherwise, North Latitude or West Longitude will be presumed.

Latitude	36 °	56 '	15 "	Longitude	93 °	55 '	30 "
----------	------	------	------	-----------	------	------	------

SECTION V-A - AM BROADCAST ENGINEERING DATA (Page 2)

5. Is the proposed site the same transmitter-antenna site of other stations authorized by the Commission or specified in another application pending before the Commission? ☒ Yes ☐ No
NO CHANGE IN EXISTING TRANSMITTER SITE.

If Yes, indicate call sign or application file number: KKBL(FM)

6. Antenna system (including ground or counterpoise system)

Non-Directional ☒ Day ☐ Night ☐ Critical Hours

Estimated efficiency 297.30 mV/m per kW at one kilometer

If antenna is either top loaded or sectionalized, describe fully in an Exhibit.
(Include apparent electrical height.)

Exhibit No.
DNA

Directional ☐ Day only (DA-D) ☐ Night only (DA-N)

☐ Same constants and power day and night (DA-1)

DOES NOT APPLY

☐ Different constants and/or power day and night (DA-2)

☐ Different constants and/or power day, critical hours and night (DA-3)

Submit complete engineering data in accordance with 47 C.F.R. Section 73.150 for each Directional antenna pattern proposed.

Non-directional/Directional

If antenna(s) is/are either top loaded or sectionalized, describe fully in an Exhibit. (Include apparent electrical height.)

Exhibit No.
DNA

Type of feed circuits (excitation) ☐ Series Feed ☐ Shunt Feed

ON FILE NO CHANGE

☐ Folded Unipole ☐ Other (explain)

TOWERS (in meters, rounded to nearest meter)	1	2	3	4	5	6
Overall height of radiator above base insulator, or above base, if grounded						
Overall height above ground (without obstruction lighting)	ON FILE NO	CHANGE				
Overall height above ground (include obstruction lighting)						
Overall height above mean sea level (include obstruction lighting)						

If additional towers, attach information exactly as it appears above.

7. Has the FAA been notified of the proposed construction?

☐ Yes ☒ No

If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available.

Exhibit No.
DNA

NO CHANGE IN EXISTING TOWER

Date _____ Office where filed _____

SECTION V-A - AM BROADCAST ENGINEERING DATA (Page 3)

8. List all landing areas within 8 kilometers of antenna site. Give distances and direction to the nearest boundary of each landing area from the antenna site.

Landing Area	Distance (km)	Direction
(a) <u>ON FILE NO CHANGE</u>		
(b) _____		
(c) _____		

9. Attach as an Exhibit a description and vertical plan sketch (including supporting buildings, if any) of the proposed structure, giving heights above ground, in meters, for all significant features. Clearly indicate existing portions, noting lighting, and distinguishing between the skeletal or other main supporting structure and the antenna elements. If a directional antenna, give spacing and orientation of towers.

Exhibit No.
ON FILE
NO CHANGE

If not fully described above, attach as an Exhibit further details and dimensions, including any other antennas mounted on tower and associated isolation circuits.

Exhibit No.
ON FILE
NO CHANGE

Attach as an Exhibit, a plat of the transmitter site clearly showing boundary lines, roads, railroads, other obstructions, and the ground system or counterpoise. Show number and dimensions of ground radials or, if a counterpoise is used, show heights and dimensions.

Exhibit No.
ON FILE
NO CHANGE

10. Will the main studio be located within the station's principal community contour as defined by 47 C.F.R. Section 73.24(1)? ☒ Yes ☐ No

If No, attach as an Exhibit a justification pursuant to 47 C.F.R. Section 73.112K.

Exhibit No.
DNA

11. Is there a remote control location or is one to be established in accordance with 47 C.F.R. Section 73.1400? ☐ Yes ☐ No

NO CHANGE ON FILE

If yes, submit the following:

State	County	City or Town
Street address (or other identification)		

12. Attach as an Exhibit a sufficient number of aerial photographs taken in clear weather at appropriate altitudes and angles to permit identification of all structures in the vicinity. The photographs must be marked so as to show compass directions, exact boundary lines of the proposed site, and locations of the proposed 1000 mV/m contour for both day and night operation. Photographs taken in eight different directions from an elevated position on the ground will be acceptable in lieu of the aerial photographs if the data referred to can be clearly shown.

Exhibit No.
NO CHANGE
ON FILE

13. Is the population within the 1 V/m (1000 mV/m) contour less than 300 persons or less than 10 percent of the population within the 25 mV/m contour?

☒ Yes ☐ No

If No, attach as an Exhibit a justification pursuant to 47 C.F.R. Section 73.24(g).

Exhibit No.
DNA

14. Environmental Statement. (See 47 C.F.R. Section 1.1301 et seq.)

(a) Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact?

☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

Exhibit No.
DNA

If No, explain briefly why not. THERE IS PROPOSED NO CHANGES IN THE TECHNICAL FACILITIES OF KRMO(AM)

(b) Distance from tower(s) to the nearest point of the fence enclosing the tower(s) in meters.

5 Meters

SECTION V-A - AM BROADCAST ENGINEERING DATA (Page 4)

15. Allocation Studies

A. Daytime (For assistance, see 47 C.F.R. Section 73.371)

- (1) For daytime operation, attach as an exhibit map(s) having appropriate scales, showing the 1000, 5, 2 and 0.5 (0.1, if Class A station) daytime contours in mV/m for both existing and proposed operations. On the map(s) showing the 5 mV/m contours CLEARLY INDICATE THE LEGAL BOUNDARIES OF THE PRINCIPAL COMMUNITY TO BE SERVED.

Exhibit No.
ON FILE

NO CHANGE

- (2) Does the daytime 5 mv/m contour encompass the legal boundaries of the principal community to be served?

SEE EXHIBIT E-1 FOR 5.0 mV/m CONTOUR

☒ Yes ☐ No

If No, attach as an Exhibit a justification for waiver of 47 C.F.R. Section 73.24(i).

Exhibit No.
DNA

- (3) For daytime operation, for stations on a frequency between 565 kHz and 1605 kHz, attach as an Exhibit an allocation study utilizing Figure M-3 (Figure A-3 47 C.F.R. Section 73.190) or an accurate full scale reproduction thereof and using pertinent field strength measurement data where available, a full scale exhibit of the entire pertinent area to show the following:

Exhibit No.
ON FILE

NO CHANGE

- (a) Normally protected and the interfering contours for the proposed operation along all azimuths.
- (b) Normally protected and interfering contours of existing stations and other proposed stations in pertinent areas with which prohibited overlap would result as well as those existing stations and other proposals which require study to clearly show absence of prohibited overlap. If prohibited overlap were to occur as a result of the proposal, appropriate justification for waiver of 47 C.F.R. Section 73.37 is to be included.
- (c) Plot of the transmitter location of each station or proposal requiring investigation, with identifying call letters, file numbers, and operating or proposed facilities.
- (d) Properly labeled longitude and latitude degree lines, shown across entire Exhibit.

- (4) For daytime operation, attach as an Exhibit a tabulation of the following:

- (a) Azimuths along which the groundwave contours were calculated for all stations or proposals shown on allocation study exhibits required by (3)(a).
- (b) Inverse distance field strength used along each azimuth.
- (c) Basis for ground conductivity utilized along each azimuth specified in (4)(a). If field strength measurements are used, submit copies of the analyzed measurements. If measurement data are taken from Commission records identify the source of the measurements in the Commission's files.
- (d) Calculated distances.

Exhibit No.
ON FILE

NO CHANGE

B. Critical Hours (If applicable, see 47 C.F.R. Section 73.187)

DNA

- (1) For critical hour operation, attach as an Exhibit map(s) having appropriate scales, showing the 1000, 5 and 0.5 critical hours contours in mV/m for both existing and proposed operations. On the map(s) showing the 5 mV/m contours CLEARLY INDICATE THE LEGAL BOUNDARIES OF THE PRINCIPAL COMMUNITY TO BE SERVED.

Exhibit No.
DNA

- (2) Does the critical hours 5 mV/m contour encompass the legal boundaries of the principal community to be served?

☐ Yes ☐ No DNA

If No, attach as an Exhibit justification for waiver of 47 C.F.R. Section 73.24(i).

Exhibit No.
DNA

- (3) For critical hours operation, attach as an Exhibit an allocation study utilizing Figure M-3 (Figure A-3 47 C.F.R. Section 73.190) or an accurate full scale reproduction thereof and using pertinent field strength measurement data where available, a full scale exhibit of the entire pertinent area to show the following: The 0.1 mV/m groundwave contour pertinent arcs of Class A stations and appropriate studies to establish compliance with 47 C.F.R. Section 73.187 when operation is proposed on a U.S. Class A channel.

Exhibit No.
DNA

C. Nighttime. (For assistance, see 47 C.F.R. Section 73.182)

DNA

- (1) For nighttime operation, attach as an Exhibit map(s) having appropriate scales, showing the 1000 mV/m and coverage contours (appropriate minimum protected value for proposed class of station, or RSS nighttime interference-free contour, whichever is the greater value) for both existing and proposed operations. On the map(s) showing the interference-free contours, CLEARLY INDICATE THE LEGAL BOUNDARIES OF THE PRINCIPAL COMMUNITY TO BE SERVED.

Exhibit No.
DNA

- (2) Does the nighttime 5 mV/m or nighttime interference free contour (which ever is higher) encompass 80% of the principal community to be served (50% for expanded band 1605-1705 kHz stations)?

☐ Yes ☐ No
DNA

If No, attach as an Exhibit Justification for waiver of, or exemption pursuant to 47 C.F.R. Section 73.24(1).

Exhibit No.
DNA

- (3) For nighttime operation, for stations on a frequency between 535 kHz and 1605 kHz, attach as an Exhibit allocation data including the following:

Exhibit No.
DNA

- (a) Proposed nighttime limitation to other existing or proposed stations with which objectionable interference could result, as well as those other proposals and existing stations which require study to show clearly absence of objectionable interference.
- (b) All existing or proposed nighttime limitations which enter into the nighttime RSS limitation of each of the existing or proposed facilities investigated under (3)(a) above.
- (c) All existing and proposed limitations which contribute to the RSS nighttime limitation of the proposed operation, together with those limitations which must be studied before being excluded.
- (d) A detailed interference study plotted upon an appropriate scale map if a question exists with respect to nighttime interference to other existing or proposed facilities along bearing other than on a direct line toward the facility considered. (Clipping study)
- (e) The detailed basis for each nighttime limitation calculated under (3)(a), (b), (c) and (d) above.

16. Attach as an Exhibit a map (7.5 minute U.S. Geological Survey topographic quadrangles, if available) of the proposed antenna location showing the following information:

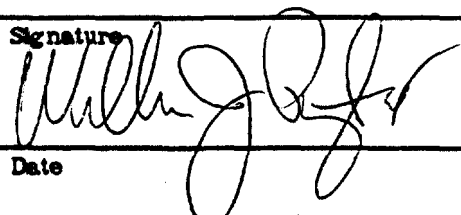
Exhibit No.
ON FILE

NO CHANGE

- A. Proposed transmitter location accurately plotted with the latitude and longitude lines clearly marked and showing a scale in kilometers.
- B. Heights of buildings or other structures and terrain elevations in the vicinity of the antenna, indicating the location thereof.
- C. Transmitter location and call signs of non-broadcast radio stations (except amateur and citizens band), established commercial and government receiving stations in the general vicinity which may be adversely affected by the proposed operation.
- D. Transmitter location and call letters of all AM, FM and TV broadcast stations within three (3) kilometers of the proposed antenna location.

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed) WILLIAM J. PENNINGTON, III	Relationship to Applicant (e.g., Consulting Engineer) TECHNICAL CONSULTANT
Signature 	Address (Include ZIP Code) 5519 ROCKINGHAM ROAD-EAST GREENSBORO, NC 27407
Date FEBRUARY 13, 1995	Telephone No. (Include Area Code) (910) 299-5257

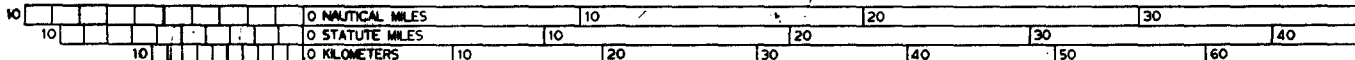
**KANSAS CITY
SECTIONAL AERONAUTICAL CHART
SCALE 1:500,000**

**EXHIBIT E-1
KRM0 5.0 mV/m SERVICE CONTOUR**

KRM0 ANTENNA SITE

**KRM0 5.0 mV/m
CONTOUR**

CASSVILLE CITY LIMITS



36-30-00

CARTER
263 CJD

LAKE
MISSOURI

ARKANSAS